

Exhibit C

(April 14, 2022 Meet and Confer Transcript)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE)
CONFERENCE OF THE NAACP,)

and)

TAIWAN SCOTT, on behalf of)
himself and all other similarly)
situated persons,)

Plaintiffs,)

v.)

MEET AND CONFER

HENRY D. MCMASTER, in his)
official capacity as Governor)
of South Carolina; THOMAS C.)
ALEXANDER, in his official)
capacity as President of the)
Senate; LUKE A. RANKIN, in his)
official capacity as Chairman)
of the Senate Judiciary)
Committee; JAMES H. LUCAS, in)
his official capacity as Speaker)
of the House of Representatives;)
CHRIS MURPHY, in his official)
capacity as Chairman of the)
House of Representatives)
Judiciary Committee; WALLACE)
H. JORDAN, in his official)
capacity as Chairman of the)
House of Representatives)
Elections Law Subcommittee;)
HOWARD KNAPP, in his official)
capacity as interim Executive)
Director of the South Carolina)
State Election Commission; JOHN)
WELLS, Chair, JOANNE DAY,)
CLIFFORD J. EDLER, LINDA MCCALL,)
and SCOTT MOSELEY, in their)
official capacities as members)
of the South Carolina Election)
Commission,)

Defendants.)

_____)

The within Meet and Confer held via speaker phone was recorded by the court reporter listed below on April 14, 2022, at the hour of 9:36 a.m. at the law offices of Nexsen Pruet, LLC, 1230 Main Street, Suite 700, Columbia, South Carolina, attended by counsel as follows:

**JAN L. WHITWORTH
VERBATIM REPORTER**

WHITWORTH COURT REPORTING

**POST OFFICE BOX 551
ROEBUCK, S.C. 29376
864-494-2705**

APPEARANCES

PARTICIPANTS VIA SPEAKER PHONE

CHRISTOPHER JAMES BRYANT, ESQUIRE

BOROUGHES BRYANT, LLC
1122 LADY STREET, SUITE 208
COLUMBIA, SOUTH CAROLINA 29201

SOMIL B. TRIVEDI, ESQUIRE

AMERICAN CIVIL LIBERTIES UNION FOUNDATION
915 15TH STREET, NW
WASHINGTON, DC 20005
strivedi@aclu.org

JOHN M. HINDLEY, ESQUIRE

ARNOLD & PORTER KAYE SCHOLER, LLP
601 MASSACHUSETTS AVENUE, NW
WASHINGTON, DC 20001

JOHN C. CUSICK, ESQUIRE

NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC.
40 RECTOR STREET, 5TH FLOOR
NEW YORK, NY 10006

DAVID ALLEN CHANEY, JR., ESQUIRE

ACLU OF SOUTH CAROLINA
1220 LAURENS ROAD, STE. B
GREENVILLE, SOUTH CAROLINA 29607
achaney@aclusc.org

ATTORNEYS FOR PLAINTIFFS,

MARK C. MOORE, ESQUIRE

JENNIFER HOLLINGSWORTH, ESQUIRE

MICHAEL A. PARENTE, ESQUIRE

HAMILTON B. BARBER, ESQUIRE

NEXSEN PRUET, LLC
1230 MAIN STREET, SUITE 700
COLUMBIA, SOUTH CAROLINA 29201

KONSTANTINE DIAMADUROS, ESQUIRE

NEXSEN PRUET, LLC
104 S. MAIN STREET, SUITE 900
GREENVILLE, SOUTH CAROLINA 29601

**ATTORNEYS FOR JAMES H. LUCAS, CHRIS
MURPHY, AND WALLACE H. JORDAN.**

* * * * *

BY MS. HOLLINGSWORTH:

As Judge Gergel -- as we spoke about with the panel and Judge Gergel two days on the privilege log, I wanted just the opportunity for us to touch base before we submit documents for the in-camera review, because I am hoping that we will be able to clear up a few of these items on the log. The first, gosh, I guess it's like almost three pages. It's really just a handful of emails, but they have attachments, but it's the first page starting with REL11642 going through on the third page, second to last, and it's REL11647, but those emails, those are emails from Emma Dean forwarding materials that Nexsen Pruet prepared and sent to Emma Dean to forward to members of the Ad-Hoc Committee. And so, based on the sort of agreements that had been in place among the attorneys prior to or sort of during the discovery components and the agreement not to -- not to be individually logging outside counsel to client emails, I wanted to raise this issue with you all that I think these -- these items, those REL numbers, and again, it's really actually just a couple of emails. They just have a number of attachments on them. That those would -- we would

1 agree that those are the privileged and protected
2 communications and not have to sort of continue in
3 argument, so to speak, on those -- those
4 communications and the work product. So, first --
5 this is sort of the first issue we can discuss.

6 **BY MR. CUSICK:**

7 And, Jennifer, this is John Cusick. I think we
8 wanted to raise because of an issue that came up in
9 some of the depositions yesterday, and I think as
10 you flag here, will implicate or could implicate
11 some of the privilege log but also discovery
12 responses, and we were hoping to just first kind of
13 to the extent you, Mark, and I think Constantine and
14 others are on, kind of determine the scope of Nexsen
15 Pruet's involvement with the Ad-Hoc Committee or the
16 House Judiciary in terms of, you know, -- and I hope
17 I am remembering this correctly, but Representative
18 Jordan said it was some time in the summer that
19 Nexsen Pruet was first retained, and then we were
20 hoping to have a little more insight into what the
21 involvement in not related to the litigation per se
22 at the time when it first started dealing with just
23 the One-Person One-Vote First Amendment claim, but
24 what involvement Nexsen Pruet had in the map room
25 and the population and understanding of maps that

1 were drawn for legislatures and, you know, was
2 hoping that we could get a little bit more insight
3 into that, because that will help us inform or maybe
4 clear up some of the things that Representative
5 Jordan was discussing yesterday.

6 **BY MR. MOORE:**

7 And so, I think that I should handle this one.
8 You know, I can't remember every discussion that
9 I've had with Chris, and I've had more discussions
10 with Chris than sort of anybody else on this call
11 about our representation, but -- and Chris did
12 thankfully flag for me that this might be a subject
13 that we might have to discuss this morning, which I
14 very much appreciate, and I also hope that this is -
15 - it sounds like this is going to be a Meet and
16 Confer where we talk to each other rather than we
17 are talked at. So, and I appreciate that. So, with
18 respect to, I mean, we were engaged, and we were
19 engaged in stages. I guess, we were engaged -- we
20 were engaged to give preplanning advice. We were
21 engaged to advise during the actual redistricting
22 process, and then we were engaged to defend any
23 actual litigation. And so, we really didn't have
24 much of an active role, and the role in the summer
25 was, I don't know that I would describe that as

1 active, John. I think it was fairly passive, but we
2 -- we were retained well before that. I think that
3 the House talked to several different law firms, and
4 they retained us. And at the time that the House
5 retained us, while we did almost nothing, we were
6 expecting the Census to come out way earlier than it
7 did, right? And so, after the delays in the Census,
8 that sort of delayed our active involvement with the
9 House, but we have been retained for some time.

10 **BY MR. CUSICK:**

11 And that's helpful, and I think I heard you say
12 about that Nexus Pruet was involved in the
13 redistricting process after the release of the
14 Censes. Did that include, you know, advising or
15 analyses or reports that were completed about maps,
16 potential maps, compliance with federal laws, state
17 law?

18 **BY MR. MOORE:**

19 I am not going to get into the specifics of
20 what we advised on, because I'm not going to breach
21 privilege, okay, but were we advising the -- your
22 three named defendants, because you -- as you know,
23 you brought an action fairly early. Were we
24 involved in advising them and advising the members
25 of the Ad-Hoc Committee through the process, to some

1 extent, yes, we were.

2 **BY MR. CUSICK:**

3 Yes. And that's ---

4 **BY MR. TRIVEDI:**

5 So, Mark, ---

6 **BY MR. CUSICK:**

7 Sorry.

8 **BY MR. TRIVEDI:**

9 Sorry, I just wanted to jump in, Mark. So,
10 these are communications about redistricting that
11 you are obviously claiming privilege over that
12 occurred before we ever filed a lawsuit. I'm just
13 wondering why those aren't on a log somewhere.

14 **BY MR. MOORE:**

15 Well, ---

16 **BY MR. TRIVEDI:**

17 We are not necessarily saying that we would
18 want to pierce that privilege, but it is -- it does
19 seem a little odd that it wouldn't have shown up in
20 that form.

21 **BY MR. MOORE:**

22 Well, Somil, I think there has been some
23 confusion, because we've never -- we've never had
24 this discussion as a group about what does and does
25 not go on a log from our standpoint or from yours,

1 and so, for example, I think that there have been a
2 ton of communications between your side and your
3 clients that were -- that was pre-filing of the
4 litigation that we haven't seen on a log either,
5 okay? And so if you want -- if you are telling us
6 that what you think we need to do is we need to
7 individually log communications between us and our
8 client before the litigation started, then I think
9 we can do that, so long as you agree to do that,
10 because what is good for the goose is good for the
11 gander. Okay, if we have to do it, so do you, and
12 we haven't seen that from you either, okay? And you
13 know, it's a little difficult to be having that
14 discussion now, okay, you know, a week before
15 discovery is about to close. But are you telling us
16 that you believe that you should have to log that as
17 well as us, and then we are only going to -- we are
18 going to group log, for example, everything that
19 post dated the filing of the litigation, because I
20 believe that all of these communications that
21 Jennifer just went over, and she will correct me if
22 I'm wrong, occurred post filing of litigation. They
23 didn't even have to be on an individual log per our
24 agreement, right? So, I mean, we are not trying to
25 play hide the ball with you, Somil, but if you

1 believe that Nexsen Pruet has to log its individual
2 communications with our clients pre -- pre your
3 filing of your lawsuit, then we are going to need
4 you to do the same.

5 **BY MR. TRIVEDI:**

6 So, let's leave aside what we think is a false
7 equivalent because I think -- I think you all are
8 saying that you participated in advice regarding the
9 maps that are at issue, and I think Judge Gergel
10 made it pretty clear that that is the issue in this
11 case and not anything that we did, but forget the
12 logs for now. Let's start with the interrogatory
13 responses. So, interrogatory -- interrogatory one
14 said "Everybody involved in the making of maps."
15 Would you all update your discovery responses, or is
16 your position that you don't have to because you
17 weren't substantively involved?

18 **BY MR. MOORE:**

19 well, were we involved in the making of maps, I
20 mean, when I -- Chris has raised this issue for me
21 this morning, okay? So, I'm going to tell you that
22 we are going to go back, and we are going to look at
23 our discovery responses, and if we think that they
24 need to be updated, they will. Advising someone on
25 how their maps are done is not necessarily

1 involvement in the making of maps.

2 **BY MR. HINDLEY:**

3 And, Mark, ---

4 **BY MR. TRIVEDI:**

5 Okay.

6 **BY MR. HINDLEY:**

7 This is John. Sorry, go ahead.

8 **BY MR. TRIVEDI:**

9 No, go ahead, John.

10 **BY MR. HINDLEY:**

11 No, I was going to say -- I think that -- I
12 know, Mark, you raised the timing issue about this,
13 and I think, you know, one of the reasons that Somil
14 flagged that, you know, both with the RFPs and the
15 interrogatory, it wasn't clear to us that Nexsen
16 Pruet played a role in the -- I know we used the
17 term map room. From my understanding as
18 Representative Jordan mentioned yesterday, it was
19 this tiered process that involved the compiling of
20 maps, the drawing of maps, you know, analysis of the
21 maps, which he said was an iteration that included
22 counsel both from the House side but also with
23 Nexsen Pruet attorneys, and so, you know, there are
24 -- I think there are a number of interrogatories
25 18915, that if there were reports or analyses or

1 evaluations that were being done, not only to the
2 maps that were being proposed by the House, but it
3 also seemed that Representative Jordan said counsel
4 including evaluating other maps that were submitted
5 as part of the scope of the work. You know, to us,
6 that seems like a different substantive role than,
7 you know, retention, or at that time, it was just a
8 One-Person One-Vote lawsuit and the First Amendment,
9 not -- it didn't have anything to do with claims the
10 racial gerrymandering or potential discrimination,
11 and so that's why we wanted to flag this now,
12 because we would also expect with some of these
13 privilege laws that -- I know you said earlier, you
14 know, rightly you won't break privilege, but we
15 would also expect then that if there were reports or
16 analyses conducted or produced, that they would also
17 be captured in some of the RFPs but in a privilege
18 log, and so I think that's Somil's more over arching
19 point that I think we have a little bit more clarity
20 now between that deposition, also with
21 Representative Newton's yesterday and some of the
22 points we've set today, and, you know, are hoping
23 that you might be able to go back and see if you
24 plan on updating any of the interrogatory or RFP
25 responses based on that.

1 **BY MR. MOORE:**

2 I mean, so, as -- and, John, as I told Chris
3 this morning, I appreciate the fact you've raised
4 these issues for us. We are going -- after we get
5 through this deposition, after I get through this
6 deposition today, I will sit down with our folks,
7 and we will take a look at these responses, and if
8 we think we need to update them, we will, but when
9 you say on a privilege log, okay, the agreement that
10 I understood we had was that you didn't have to log
11 individual entries on the priv log after the filing
12 of the lawsuit just like we didn't, okay? I think
13 Jennifer may have thought that it was broader, and
14 again, it would have -- you know, if we had had a
15 discovery conference where we discussed that a long
16 time ago, that would have been helpful, but in any
17 event, I don't think that per the agreement between
18 the parties that we have an obligation to go back
19 and do individual -- log individual communications
20 that we had with our clients after the filing of the
21 lawsuit, because that's been an agreement between
22 the parties, and I don't think you guys get to
23 revisit that at this stage.

24 **BY MR. CUSICK:**

25 I'll say one thing on that just real quickly,

1 Mark, and I don't know if I -- I know I was probably
2 on some of these calls and, you know, Chris and
3 other folks can weigh in on this, but I think that
4 that understanding based on this new information
5 that the expectation was at that time whatever
6 agreement, it wasn't clear in the discovery
7 responses or any otherwise that Nexsen Pruet was
8 involved in the actual evaluation map drawing
9 process, and I think that's a different set of
10 consideration as opposed to Nexsen Pruet's
11 involvement in again, that One-Person One-Vote and
12 First Amendment claim, as opposed to the actual
13 drawing of the maps.

14 **BY MR. MOORE:**

15 Well, I mean ---

16 **BY MR. CUSICK:**

17 We know that ---

18 **BY MR. MOORE:**

19 I'm sorry, John, I'll let you finish.

20 **BY MR. CUSICK:**

21 No, no, I was just going to say I don't know if
22 other folks 'cause I don't -- I wasn't -- I don't
23 remember the full scope of that agreement. So, I
24 don't know if Chris or other folks can -- might be -
25 - might have a better sense just so I don't misstate

1 anything.

2 **BY MR. TRIVEDI:**

3 No, John, this is Somil. I don't think you are
4 misstating anything. I think we all agree that
5 there was an agreement that we didn't have to log
6 communications with our clients post filing of the
7 first complaint, but that agreement was made without
8 the understanding that lawyers on your side were
9 involved in advising or making or whatever verb you
10 want to use, the substantive maps, which is just a
11 qualitative difference. We didn't know that. We
12 think that Nexsen Pruet had every opportunity to
13 tell us that before now, but be that as it may, we
14 found out yesterday, and we are raising it today.

15 **BY MR. MOORE:**

16 Well, I mean, I ---

17 **BY MR. TRIVEDI:**

18 And not the day in court.

19 **BY MR. MOORE:**

20 And I would disagree with you on that, Somil,
21 but again, we will take a look at our discovery
22 responses, and we will consult with our client, and
23 if we need to amend those discovery responses, we
24 will amend them. As I told Chris this morning, so
25 he is not going to be shocked to hear me say this,

1 you know, had you guys done what Judge Gergel pretty
2 much told you you should have done at the hearing is
3 taking some depositions a long time ago, then we
4 might not be where we are today. But we can't ---

5 **BY MR. TRIVEDI:**

6 And if you had just told us you were involved
7 in advising on the maps, we wouldn't be here. So,
8 let's let bygones be bygones. We really appreciate
9 you offering to update your discovery responses. We
10 will be in touch about that over the next couple of
11 days, fair?

12 **BY MR. MOORE:**

13 That's fair. But we still have to resolve --
14 this court expects us to get them something on this
15 privilege log by tomorrow, correct?

16 **BY MR. TRIVEDI:**

17 That's true, yep.

18 **BY MR. MOORE:**

19 But I agree with you, you can't put the
20 toothpaste back in the bottle. We can only move
21 forward from here.

22 **BY MR. TRIVEDI:**

23 So, should we go back to Jennifer's ---

24 **BY MR. MOORE:**

25 I do think we should.

1 **BY MR. TRIVEDI:**

2 --- accounting of the particular things on the
3 log? Yeah.

4 **BY MR. MOORE:**

5 I do think we should. And I will also say,
6 before Jennifer starts, I just want to say I think
7 you will get a lot more clarity on Nexsen Pruet's
8 involvement when you depose Patrick Dennis, but keep
9 going.

10 **BY MS. HOLLINGSWORTH:**

11 Well, I mean, I think it -- at this point, it's
12 unclear to me then what the position is going to be,
13 because kind of my expectation of the call or our
14 discussion here was because, I think, again roughly
15 half of these items is -- would fall within the
16 agreement, like I said, it's kind of the first three
17 pages -- well, I guess I don't know how you have it
18 printed, but it's REL11642 through 11647, which is
19 really just a handful of emails with attachments are
20 the Nexsen Pruet materials, the communication and
21 work product. And so under, again what I had
22 understood to be the agreement, wouldn't be logged
23 because we agreed that it's post litigation and it's
24 outside counsel, so...

25 **BY MR. TRIVEDI:**

1 You're right. You are right, Jennifer. We
2 should probably proceed with what we were going to
3 do under the terms of our agreement for purposes of
4 the priv log submission and the in-camera submission
5 to Judge Gergel, just 'cause we wouldn't make his
6 deadline otherwise. So, yeah, let's step through
7 the conversation you were going to have before this
8 conversation about Nexsen Pruet's involvement. We
9 will wait for the updated discovery responses, and
10 we will keep talking about that issue, and if we
11 need to update Judge Gergel or send updated
12 discovery -- I mean, sorry, privilege logs after
13 that, we will. Is that fair?

14 **BY MR. MOORE:**

15 That sounds like that makes perfect sense.

16 **BY MS. HOLLINGSWORTH:**

17 Yeah, I think that does -- that would be
18 helpful, I think, and gets us kind of moving as
19 efficiently forward as we can.

20 **BY MR. TRIVEDI:**

21 Right, okay, great.

22 **BY MS. HOLLINGSWORTH:**

23 So, what I would like to suggest is that again,
24 sort of at least for now working from what we -- the
25 agreement that we had had, that we would agree that

1 those REL numbers that I just read through do not
2 have to be submitted for in-camera review at least
3 at this time, because they would be -- we would
4 agree that those are privileged and not subject to
5 sort of -- we wouldn't challenge them at this point,
6 I guess is what I'm trying to get at, 'cause it's --
7 it saves like half of the documents from having to
8 go through this process, because like I said, it's a
9 few emails and then those attachments. And based on
10 the agreement, at least as it stands until we revise
11 it, I would suggest or ask, you know, do plaintiffs
12 agree that we don't need -- there won't be a
13 challenge to that at this time. So, we don't need
14 to submit those to the court for review at this
15 time.

16 **BY MR. BRYANT:**

17 Jennifer, this is Chris, and I think that the
18 answer is yes, that it's not agreeing that it
19 necessarily is privileged but based on the
20 agreement, you know, that we had, it's not the
21 (inaudible) now.

22 **BY MS. HOLLINGSWORTH:**

23 Right. But we have a path forward, and we can
24 -- if that needs to be revisited and part of how we
25 rework the privilege log process, then we would deal

1 with it at that time.

2 **BY MR. BRYANT:**

3 Exactly.

4 **BY MS. HOLLINGSWORTH:**

5 Okay. And then that really -- I mean, we've
6 done all of this on the call, but that was the
7 extent of it, I mean, of the remaining items. I
8 think we found one duplicate and then I think we
9 found one that we are going to take off and produce,
10 but otherwise, you know, the rest we will submit for
11 the in-camera review, but I just wanted the
12 opportunity to speak with you all to get some
13 clarity on the agreement at least as it existed, and
14 then we will -- it looks like we've got a path
15 forward, and we will work with you all on that in
16 the coming days.

17 **BY MR. MOORE:**

18 Do we need to have any discussion with them
19 about their privilege log, or are we good on that?

20 **BY MS. HOLLINGSWORTH:**

21 I didn't have any, but of course, if there's
22 anything that plaintiffs want to raise, I have no
23 problem talking about it.

24 **BY MR. CHANEY:**

25 Yeah, I think -- this is Allen. We've got some

1 updates on ours. We went back in and kind of re-
2 scrutinized it after the call with the panel, and I
3 think John was on the call and can jump in with
4 that.

5 **BY MR. HINDLEY:**

6 Yep, thank you, Allen. Jennifer, just a quick
7 question. Which document on the priv log are you
8 downgrading and producing, just so I can have it
9 written down?

10 **BY MS. HOLLINGSWORTH:**

11 Oh, let me see. 11667.

12 **BY MR. HINDLEY:**

13 And does that include the attachment?

14 **BY MS. HOLLINGSWORTH:**

15 It does.

16 **BY MR. HINDLEY:**

17 Okay, thank you. And I'm looking at our
18 amended privilege log that we submitted as a part of
19 our -- that we served as pleas last Monday.
20 Regarding seven and nine, after reviewing the logs,
21 we determined that the items are not relevant. They
22 do not relate to State House redistricting. So, we
23 are going to take them off the log but not produce
24 them. Items 15 and 16, we are prepared to downgrade
25 and produce them to you, but with the understanding

1 that doesn't represent a larger waiver. These are
2 just discussions regarding a Zoom meeting.

3 **BY MR. CUSICK:**

4 And, sorry, John, just to be clear, you are
5 talking about the NAACP tab?

6 **BY MR. HINDLEY:**

7 Sorry, yeah, and the NAACP privilege log.

8 **BY MS. HOLLINGSWORTH:**

9 Okay.

10 **BY MR. MOORE:**

11 Okay.

12 **BY MR. HINDLEY:**

13 And then turning to Taiwan Scott's privilege
14 log, we are prepared to produce the email
15 communications with Don Brashears knowing that they
16 are not -- producing these -- downgrading and
17 producing these does not represent a larger waiver
18 of attorney/client privilege.

19 **BY MR. MOORE:**

20 Understood.

21 **BY MR. HINDLEY:**

22 And for both privilege logs, we are also
23 prepared to take off documents and communications
24 that are after the October 12th filing date for both
25 sides, which will significantly reduce the size of

1 both logs. So, those are the updates we have on our
2 end.

3 **BY MR. MOORE:**

4 That sounds like a reciprocal agreement, and
5 that sounds great, all right.

6 They are taking off their communications that
7 they have logged that post date the filing of the
8 lawsuit.

9 **BY MS. HOLLINGSWORTH:**

10 But just communications with your client. So,
11 if it's communications where there's a privilege or
12 a protection claim with a third party, that would
13 still be logged, right?

14 **BY MR. HINDLEY:**

15 Absolutely.

16 **BY MS. HOLLINGSWORTH:**

17 Okay.

18 **BY MR. MOORE:**

19 And, Chris, you were not here for this
20 discussion, but I raised the issue of whether we
21 were going to have a settlement today. I just got a
22 text from Judge Baker. She obviously sent it ---

23 **BY MR. BRYANT:**

24 Yeah, she copies me on that.

25 **BY MR. MOORE:**

1 --- to someone on your side. I don't know.
2 It's not a number I recognize, but maybe it's a
3 different number that you have, Chris.

4 **BY MR. BRYANT:**

5 The 847 is my personal number. Yeah.

6 **BY MR. MOORE:**

7 So, we need to let her know something as you
8 can tell. What I suggested is that after this --
9 after President Murphy's deposition, perhaps we
10 schedule a time today for a call. I'm actually
11 happy to do it now and if you think that that's - if
12 you think that's better for us, and have the court
13 reporter stop recording that session, and we just
14 wait for a few minutes for President Murphy, but you
15 tell me what you want to do. I don't like to keep
16 Judge Baker waiting.

17 **BY MR. BRYANT:**

18 Yeah. John -- John Cusick, this might sort of
19 be in your court, because I'm not sure, you know,
20 what communications you've had or been able to have
21 with President Murphy and the (inaudible).

22 **BY MR. MOORE:**

23 So, let's end this.

24 **BY MS. HOLLINGSWORTH:**

25 Yeah, are we good on the -- have we finished

1 our discussions with regard to the privilege -- the
2 meet and confer as just for purposes of the court
3 reporter.

4 **BY MR. CUSICK:**

5 Let me jump in with one thing on that really
6 quick and just say that ---

7 **BY MS. HOLLINGSWORTH:**

8 Yes.

9 **BY MR. CUSICK:**

10 --- pursuant to the order that the panel filed
11 yesterday, we will get you guys a confidentiality
12 agreement for the exchange of member information.

13 **BY MS. HOLLINGSWORTH:**

14 Okay.

15 **BY MR. CUSICK:**

16 We will get you that today, so that we can
17 produce that information tomorrow.

18 **BY MS HOLLINGSWORTH:**

19 Okay. That sounds good.

20 **BY MR. MOORE:**

21 That would be great. Thank you. Constantine
22 will be able to look at that while I'm otherwise
23 occupied and while Jennifer starts to try to take
24 some well deserved time off with her family.

25 **BY MR. CUSICK:**

I will reach out to Constantine then.

BY MR. MOORE:

I mean, send it to all of us, but Constantine is going to take the lead on looking at it. He - I belieev that he is skilled enough to do that.

BY MS. HOLLINSWORTH:

Anything else for the good of the order on the conferral issues?

BY MR. CUSICK:

That's it. The plaintiffs are ready to go off the record with the court reporter.

(CONCLUDED AT THE HOUR OF 10:18 A.M.)

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**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
Civil Action No.: 3:21-cv-03302-JMC-TJH-RMG**

I, JAN L. WHITWORTH, A NOTARY PUBLIC FOR THE STATE OF SOUTH CAROLINA, DULY COMMISSIONED AND QUALIFIED AS SUCH, DO HEREBY CERTIFY THAT THE FOREGOING **26** PAGES REPRESENTS A TRUE AND ACCURATE TRANSCRIPT OF THE FOREGOING MEET AND CONFER TAKEN ON THE 14TH DAY OF APRIL, 2022.

IN WITNESS WHEREOF, I HAVE SET MY HAND THIS 18TH DAY OF APRIL, 2022.

JAN L. WHITWORTH
NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES: 02/04/2024